



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107-4431

MAR 18 1996

Mr. Orlando Monaco  
Naval Facilities Engineering Command  
Northern Division, Code 0223  
10 Industrial Highway, Mailstop 82  
Lester, Pennsylvania 19113

Re: Naval Air Warfare Center (NAWC), PA

Dear Mr. Monaco:

This letter follows up on previous EPA comments on "Proposed Subsurface Soil Investigations for Area A" submitted to the Navy in letters dated February 12 and February 26, 1996..

The subject comments indicated that EPA would provide remaining comments on any investigations proposed for the vicinity of the two "areas of interest" within Area A "upon receipt and review of analytical data (including Tentatively Identified Compound (TIC) data) for soil samples collected during the construction of groundwater transfer lines". Unfortunately, this information still has not been provided and the Navy has initiated the investigation of the "area of interest" south of the fuel farm without receiving any EPA comments on the proposed work. As discussed, conducting this (or any) RI work prior to receiving EPA comments is clearly inconsistent with the Federal Facility Agreement between the Navy and EPA for NAWC. Again, please provide the subject data to EPA as requested.

In addition, as discussed at a BCT meeting last week, please provide our office TIC data for the most recent round of RI samples for each monitoring well within Area A. This information has already been requested by David Fennimore, a representative of the FLRA and the WTMA, at a meeting of the RAB on March 7. Since TIC data may provide evidence of a release of petroleum products, this information is of particular interest for monitoring wells located downgradient of fuel storage tanks, including those immediately downgradient of fuel farm and "area of interest" noted above. As you are aware, while elevated levels of organic vapors were detected during field screening of soils excavated from this "area of interest" during construction of the transfer lines, preliminary results of lab analyses indicate that no TCL volatile organics were detected. This suggests a potential release of fuel to soils (and, potentially, groundwater) within this area. Per DOD guidance, information which indicates a release of petroleum products to property targeted for transfer should be included in documentation supporting a FOSL or FOST.

Should you have any questions or comments regarding the above,  
please give me a call.

Sincerely,

A handwritten signature in cursive script, appearing to read "Darius Ostrauskas".

Darius Ostrauskas  
Remedial Project Manager

cc: Tom Ames, NAWC  
David Kennedy, PADEP  
Jeff Pike  
Kathy Davies  
Brian Nishitani